

Robert Novack
Mary L. Moore
EDWARDS ANGELL PALMER & DODGE LLP
One Giralda Farms
Madison, New Jersey 07940
(973) 520-2300
Attorneys for Defendants
Chartis, Inc. and National Union Fire Ins. Co. of Pittsburgh, PA

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HOLLY BAKKE, CHARLES CARUSO,
ANGEL DENIS, FRANCISCO
DOMINIQUEZ, JOSEPH GINARTE,
ARTHUR GUIDA, LASZLO HAJDU-
NEMETH, FREDERIC LEIGHTON,
RAYMOND LESNIAK, ROBERTO
MADAM, ANTONIA MARTINEZ, TONY
MONTEIRO, FRANCISCO MEJIA,
REMBERTO PEREZ, GEORGE THALODY,
PHILIP WALDORF, and SAUL UNTER,

Plaintiffs,

v.

CHARTIS, INC. and NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA,

Defendants.

Civil Action No.

**APPLICATION AND ORDER FOR AN
EXTENSION OF TIME TO ANSWER,
MOVE OR OTHERWISE REPLY
PURSUANT TO L.CIV.R. 6.1(b)**

Document Electronically Filed

Application is hereby made for a Clerk's Order extending the time within which defendants Chartis, Inc. and National Union Fire Insurance Co. of Pittsburgh, PA, may answer, move or otherwise reply to the Complaint filed by plaintiffs Holly Bakke, et al. for a period of fifteen (15) days, and by plaintiffs' consent through February 1, 2010. In connection with Chartis and NUFIC's application herein, it is hereby represented that:

1. No previous extension has been obtained.

2. Service of Process was effected on defendants on November 19, 2009.

3. The time for defendants to answer, move or otherwise reply to plaintiffs' Summons and Complaint presently expires on December 19, 2009. Defendants respectfully request that this deadline be extended through Monday, February 1, 2010. Plaintiffs' counsel of record has consented to this requested extension.

4. This application is made without waiving any defenses including, but not limited to, failure to state a claim, improper service of process and lack of personal jurisdiction.

s/Robert Novack (RN4514)
ROBERT NOVACK
EDWARDS ANGELL PALMER & DODGE LLP
Attorneys for Defendants
One Giralda Farms
Madison, New Jersey 07940
(973) 520-2300
rnovack@eapdlaw.com

Dated: December 17, 2009

ORDER

The above application to extend the time within which defendants may answer, move or otherwise reply to plaintiffs' Complaint, through and including Monday, February 1, 2010, is ORDERED GRANTED.

ORDER DATED: _____

By: _____
Deputy Clerk